

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

FARRIE R. EASTER-GREENE, *et ux.* \* \*

Plaintiffs \* \*

v. \* Civil Action No.: 1:14-cv-01040-MJG

VERIZON MARYLAND, LLC, *et al.* \* \*

Defendants \* \*

\* \* \* \* \* \* \* \* \* \* \* \* \*

**AMENDED NOTICE OF REMOVAL**

Petitioners/Defendants, Harbor Group International, LLC and Harbor Group Management Company (“Harbor Group”), by its undersigned attorneys, pursuant to 28 U.S.C. §§ 1332, 1441, Rule 15 (a) (1) (A) and Local Rule 103.5 files this Amended Notice of Removal of this action from the Circuit Court for Baltimore City, Maryland to the United States District Court for the District of Maryland, and in support thereof respectfully avers as follows:

1. Harbor Group and Verizon Maryland, LLC (“Verizon”) have been named as Defendants in a suit filed in the Circuit Court for Baltimore City, Case No.: 24-C-14-000790 OT. Suit was originally filed on February 20, 2014. Harbor Group was originally served by certified mail on March 4, 2014.

2. The above-entitled matter is a civil action against Harbor Group and Verizon, in which the Plaintiffs seek compensation for Negligence – Harbor Group (Count I), Tort arising from Breach of Contract – Harbor Group (Count II), Breach of Contract – Harbor Group (Count III), Nuisance – Harbor Group (Count IV), Negligence – Verizon Maryland, LLC (Count V) and Joint Claims of Plaintiffs (Count VI).

3. Plaintiffs, Farrie Easter-Greene and Anthony Greene (“Plaintiffs”), are residents of Maryland, residing at 2453 Barnesly Place Drive, Baltimore Maryland 21244.

4. Harbor Group Management Company has its principal place of business in the State of Virginia, located at 555 East Main Street, 17th floor, Norfolk, Virginia, 23510. Harbor Group International, LLC, has its principal place of business in the State of Virginia, located at 999 Waterside Drive, Suite 2300, Norfolk, Virginia, 23510.

5. Upon information and belief, Verizon Maryland, LLC, is a limited liability corporation and is a citizen of Delaware and New York.

6. The above-entitled action is one in which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332 (diversity of citizenship). Petitioner seeks to remove this action to this Court under 28 U.S.C. §1441.

7. Petitioners are entitled to removal because the amount in controversy exceeds \$75,000.00 and there is complete diversity of citizenship between the Petitioners, Plaintiffs and Verizon.

8. Copies of the state court documents served on the Petitioner, including the (1) Writ of Summons, (2) Complaint and Jury Demand and (3) Interrogatories and Requests for Production of Documents to each Defendant were electronically file with Petitioners’ Notice of Removal.

9. Verizon consents and joins in the removal of this action from state court. (*See* ECF No. 14).

WHEREFORE, Petitioners/Defendants Harbor Group International, LLC and Harbor Group Management Company respectfully requests that the above-entitled action be removed

from the Circuit Court for Baltimore City, Maryland to the United States District Court for the District of Maryland.

Respectfully submitted,

/s/

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*Attorneys for Harbor Group International, LLC &  
Harbor Group Management Company*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24th day of April, 2014, a copy of the foregoing Amended Notice of Removal was sent electronically to Marvin Singer, Esquire, 10 East Baltimore Street, Baltimore, Maryland, 21202; Kim Parker, Esquire, 2123 Maryland Avenue, Baltimore, Maryland, 21218, *Attorneys for Plaintiffs* and William Jackson, Esquire, Moore & Jackson, LLC, 350 Washington Avenue, Suite 401, Towson, Maryland 21204, *Attorneys for Verizon Maryland, LLC.*

/s/

Imoh E. Akpan